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Attorneys for Plaintiff  
MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MATSUSHITA ELECTRIC INDUSTRIAL  
CO., LTD.,

Plaintiff,

v.

CMC MAGNETICS CORP., HOTAN  
CORP., and KHYPERMEDIA CORP.,

Defendants.

Case No. C 06-04538 WHA

**STIPULATION AND ~~[PROPOSED]~~  
ORDER AUTHORIZING  
DEPOSITIONS AT THE U.S.  
CONSULATE IN  
OSAKA- KOBE, JAPAN**

**DEPOSITION TO BE TAKEN AT THE U.S. CONSULATE  
IN OSAKA-KOBE, JAPAN**

TO: ANY CONSUL OR VICE CONSUL OF THE UNITED STATES OF  
AMERICA ASSIGNED TO OSAKA-KOBE, JAPAN

This request is made in conjunction with the above-captioned lawsuit, which relates to certain U.S. patents owned by Matsushita Electric Industrial Co. (Panasonic), whether those patents are valid and enforceable, and whether those patents are infringed by CMC Magnetics Corp., (CMC) Hotan Corp., (Hotan) and Khypermedia Corp., (Kypermedia) (collectively, Defendants).

Upon the stipulation of the parties and pursuant to Fed. R. Civ. P. 30 and Article 17 of the United States-Japan Consular Convention, you have been duly appointed to permit, and counsel are hereby authorized to take, the oral depositions of the following witnesses, who will appear voluntarily, and to mark any documentary exhibits in connection therewith at the United States consulate in Osaka-Kobe, Japan:

<b>Deponent</b>	<b>Deposition Dates<sup>1</sup></b>
Isao Satoh, Former Panasonic employee, 1006 Kadoma, Kadoma City Osaka 571-8501, Japan (MEI Business Address)	On or about January 9-10, 2007
Masatoshi Takao Panasonic employee 1006 Kadoma, Kadoma City Osaka 571-8501, Japan (MEI Business Address)	On or about January 11-12, 2007
Toshimitsu Kurumizawa Panasonic employee 1006 Kadoma, Kadoma City Osaka 571-8501, Japan (MEI Business Address)	On or about January 16-17, 2007
Sadao Mizuno Panasonic employee 1006 Kadoma, Kadoma City Osaka 571-8501, Japan (MEI Business Address)	On or about January 18-19, 2007

<sup>1</sup> These dates are subject to change upon agreement of the parties.

Accordingly, IT IS HEREBY ORDERED that these depositions be taken at the United States Consulate in Osaka-Kobe, Japan, before any Consul or Vice Consul of the United States, or such other consulate as may be available, on or about the dates indicated, and authority is given to mark any documentary exhibits in connection with these depositions. The testimony obtained shall be used for any and all appropriate purposes.

The parties hereby agree that the court reporter will distribute copies of the deposition transcript with no further involvement of the consulate.

Counsel for Defendants who may participate in these depositions are Alexander J. Hadjis, Steven H. Frankel, Richard Green, Laura Wytsma, Mark E. Wadzyk, Michael Maas, David Ziskind, Yan Wang, Robert Giles, and Paul Kletzly, along with staff-members Eun-Hue (Jennifer) Choi and/or Mary Christine Eggstaff. Counsel for Panasonic who may participate in these depositions are Matthew D. Powers, Jeffrey G. Homrig, Christopher J. Cox, David Yohai, Eugene Mar, and Adam Hemlock. Hironobu Tsukamoto of Weil, Gotshal & Manges, the law firm representing Panasonic, and one or more employees of Panasonic may also attend the depositions. These proceedings may be reported by a court reporter (Delaine Hall of LAD Reporting and/or another court reporter) and may be videotaped by a videographer (Paul Diserio, Dean Harrington, and/or another videographer) chosen by CMC for this purpose. The proceedings may be translated by an interpreter (Bruce Holcombe and associates and/or another interpreter) chosen by CMC. A check interpreter chosen by Panasonic may participate in the deposition as well.

SO STIPULATED.

Dated: December 11, 2006

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Dated: December 11, 2006

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By: \_\_\_\_\_/s/  
Jeffrey G. Homrig

[27255636]

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 13, 2006

Hon. William H. Alsup  
United States District Court Judge

